

EXHIBIT C

SYLVIA SHEN 30b6 Highly Confidential - AEO
In Re: Telescopes Antitrust Litigation

March 27, 2024

1

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA

3 in re: TELESCOPES)
ANTITRUST LITIGATION)
4 This Document Relates to:) Case No.:
AURORA ASTRO PRODUCTS) 5:20-CV-03639-EJD
5 LLC, et al.,) 5:20-CV-03642-EJD
)
6 Plaintiff,)
)
7 v.)
)
8 CELESTRON ACQUISITION,)
LLC, et al.,)
9)
Defendants.)
10 _____)

11
12
13 HIGHLY CONFIDENTIAL: ATTORNEYS' EYES ONLY

14 30(b)(6) VIDEOTAPED DEPOSITION OF SYLVIA SHEN

15 CONDUCTED VIRTUALLY

16 March 27, 2024

17 9:03 a.m.
18
19
20
21
22

23 REPORTED BY:

24 Tammy Moon, CSR No. 13184, RDR, CRR
25

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1	right now?	09:49:57
2	A. I know you are talking about Synta Canada	09:50:19
3	right now.	09:50:20
4	Q. Okay. I'll ask you some questions, then.	09:50:21
5	What --	09:50:26
6	MR. FROST: Eric, hold on one second. I'm	09:50:26
7	sorry.	
8	MR. SCHLABS: Sure.	09:50:52
9	THE WITNESS: I have -- I have one	09:50:52
10	question. When you talked about the relevant time	09:50:53
11	period, did you mean from 2005? I heard you mention	09:50:55
12	2001. I'm a little confused.	09:51:03
13	MR. SCHLABS:	09:51:14
14	Q. I believe the relevant time period for this	09:51:15
15	topic is January 1st, 2001, through the present.	09:51:17
16	MR. FROST: Even though the lawsuit only	09:51:23
17	relates to 2005, we're allowing them to ask	09:51:27
18	questions for a little bit prior to that period, to	09:51:30
19	2001. So if you have any information for that	09:51:32
20	period, it's okay to provide that.	09:51:35
21	MR. SCHLABS:	09:52:24
22	Q. Ms. Shen, do you -- do you understand the	09:52:25
23	relevant time period?	09:52:27
24	A. I understand.	09:52:36
25	Q. Okay. Thank you. What year was Synta	09:52:37

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1 Canada established?

09:52:41

2 A. December 1996.

09:53:00

3 Q. Who started Synta Canada?

09:53:05

4 A. When it started, there were three
5 shareholders.

09:53:36

09:53:38

6 Q. And who were those three shareholders?

09:53:44

7 A. David Shen, Sylvia Shen, and Jack Chen.

09:54:10

8 Q. And for what purpose was Synta Canada
9 established?

09:54:18

09:54:21

10 MR. FROST: Did the video go off? Okay.

09:54:43

11 THE WITNESS: At that time, it was because
12 we, Jack and I, immigrated to Canada. We wanted to
13 open a company to see whether there were businesses
14 that we could do.

09:55:22

09:55:24

09:55:31

09:55:36

15 MR. SCHLABS:

09:55:39

16 Q. Okay. Thank you. Is Synta Canada still
17 operating?

09:55:40

09:55:42

18 MR. FROST: Objection. Vague and
19 ambiguous.

09:55:54

09:56:17

20 THE WITNESS: I would -- I would like to
21 ask what "operating" means.

09:56:17

09:56:19

22 MR. SCHLABS:

09:56:21

23 Q. I can ask some more specific questions. Is
24 it fair to call Synta Canada a holding company?

09:56:22

09:56:27

25 THE CHECK INTERPRETER: "A more specific

09:56:43

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1	question" was translated into "a more similar	09:56:44
2	question."	09:56:47
3	THE MAIN INTERPRETER: So interpreter will	09:56:55
4	retranslate that part, then.	09:56:56
5	(Interpretation by interpreter.)	09:57:29
6	THE WITNESS: I think so.	09:57:29
7	MR. SCHLABS:	09:57:33
8	Q. Has Synta Canada ever sold telescopes?	09:57:34
9	A. As far as I know, it has never bought or	09:58:02
10	sold telescopes.	09:58:06
11	Q. Okay. Thank you. Has Synta Canada ever	09:58:12
12	designed telescopes or telescope features?	09:58:15
13	THE MAIN INTERPRETER: The interpreter did	09:58:52
14	not hear the witness clearly. Interpreter will	09:58:53
15	double-check.	09:58:56
16	(Interpretation by interpreter.)	09:59:14
17	THE WITNESS: So Synta Canada has never	09:59:14
18	designed telescopes.	09:59:16
19	MR. SCHLABS:	09:59:20
20	Q. Has Synta Canada ever manufactured	09:59:20
21	telescopes?	09:59:24
22	A. Synta Canada has never manufactured	09:59:45
23	telescopes either.	09:59:49
24	Q. Has Synta Canada ever had employees?	09:59:52
25	A. Synta Canada did not have any employees	10:00:27

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1 before 2011.

10:00:29

2 Q. Did Synta Canada have employees after 2011?

10:00:41

3 A. Yes. Correct.

10:00:59

4 Q. And who were they?

10:01:02

5 THE MAIN INTERPRETER: The interpreter

10:01:28

6 needs to double-check.

10:01:30

7 (Interpretation by interpreter.)

10:01:37

8 THE WITNESS: Mainly two to three

10:01:37

9 engineers.

10:01:39

10 MR. SCHLABS:

10:01:46

11 Q. Does Synta Canada currently have any

10:01:47

12 employees?

10:01:49

13 A. No.

10:02:03

14 Q. When was the last time Synta Canada had an

10:02:04

15 employee?

10:02:12

16 A. Around -- between -- around 2018 to 2019.

10:02:13

17 Q. Has Synta Canada ever had any employees

10:02:46

18 aside from the two to three engineers who you

10:02:49

19 mentioned?

10:02:52

20 A. As far as I can recall, there were also

10:03:45

21 some others -- for example, the payroll people or

10:03:49

22 people doing chores for the company. They were

10:03:52

23 short term, and if they came and -- they come and

10:03:57

24 go.

10:04:03

25 Q. Anyone aside from the engineers, the

10:04:04

1 payroll people, and the short-term people doing 10:04:08
2 chores for the company? 10:04:11

3 A. I can't recall. 10:04:41

4 Q. What were the names of the two to three 10:04:44
5 engineers who were employed by Synta Canada sometime 10:04:47
6 between 2011 and 2019? 10:04:52

7 A. They are Eric Liu, Justin Liu, Frank Liu. 10:05:39

8 Q. Thank you. And what were the day-to-day 10:05:51
9 responsibilities of those engineers at Synta Canada? 10:05:53

10 A. Their responsibilities -- they took care of 10:07:21
11 their jobs. For example, they had goals to reach. 10:07:26
12 So every day, they would focus on how to reach the 10:07:31
13 goals. 10:07:36

14 Compared with a regular type of job, it's 10:07:39
15 hard to say their daily responsibilities because 10:07:42
16 they needed time to achieve the goals. So it was 10:07:47
17 not like they did some -- something every day and 10:07:52
18 type. 10:07:59

19 Q. What were their goals? What kinds of 10:08:02
20 projects were they working on? 10:08:04

21 A. Because -- I'm not an engineering person, 10:09:09
22 so I really cannot give you any detailed answers. 10:09:12

23 Q. Even if you can't give me any detailed 10:09:21
24 answers, can you tell me whether they were working 10:09:25
25 on engineering for telescopes or telescope 10:09:29

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1 accessories?

10:09:33

2 A. So I don't know whether I can answer your
3 question this way. The items that we were working
4 on were electronic products and software
5 development-related items. They were not
6 telescopes.

10:11:31

10:11:33

10:11:37

10:11:41

10:11:49

7 Telescopes are more related to optics and
8 machinery, and we -- we were not in the telescope
9 field. How do I put it? It's -- telescope is in a
10 different field. We were not in the field of
11 optics, machinery, or the whole telescopes.

10:11:50

10:11:54

10:12:04

10:12:09

10:12:16

12 Q. Okay. Thank you. That's helpful. Did
13 Synta Canada sell any electronic products or
14 software?

10:12:23

10:12:27

10:12:31

15 A. In the end, we sold the -- the outcome we
16 got from the electronic products and software to our
17 customers.

10:13:39

10:13:47

10:13:53

18 Q. And who were Synta Canada's customers of
19 electronic products and software?

10:13:58

10:14:02

20 A. And our -- Synta Canada's customer. In the
21 end, we -- in the end, we sold it to Nantong
22 Schmidt.

10:15:29

10:15:32

10:15:48

23 Q. Did Synta Canada have any customers for any
24 products other than Nantong Schmidt?

10:15:48

10:15:52

25 A. We did not sell other products.

10:16:26

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1	Q. And for the products that it did have,	10:16:33
2	electronic products and software products, did Synta	10:16:37
3	Canada sell those to any customers other than	10:16:41
4	Nantong Schmidt?	10:16:45
5	A. They did not sell them to other customers,	10:17:28
6	but I would like to clarify one thing. Our products	10:17:31
7	were sold to Pacific. Through Pacific, they were	10:18:25
8	sold to Nantong Schmidt.	10:18:29
9	Q. Okay. Thank you. That's helpful. So is	10:18:39
10	it fair to say that all of Synta Canada's products	10:18:48
11	were sold to Nantong Schmidt through Pacific?	10:18:50
12	A. You can say that.	10:19:20
13	Q. Does -- since 2019, has Synta Canada done	10:19:27
14	any engineering work?	10:19:30
15	A. As far as I know, nothing after that.	10:19:58
16	Q. Did the engineers employed by Synta Canada	10:20:01
17	do work for any other companies in their capacity as	10:20:11
18	Synta Canada employees?	10:20:17
19	MR. FROST: Can you read that question	10:20:41
20	back, please.	10:20:42
21	(Record read.)	10:20:56
22	THE WITNESS: As far as I know, no.	10:21:13
23	I would like to take a break.	10:21:15
24	MR. SCHLABS: Okay. We can take a break.	10:21:17
25	THE VIDEOGRAPHER: Off the record at	10:21:21

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1	shareholders when the company was started?	11:06:01
2	A. Yes.	11:06:16
3	Q. Were there ever any other shareholders	11:06:16
4	other than yourself, David Shen, Jack Chen, and the	11:06:19
5	two family trusts?	11:06:25
6	A. No, as far as I know.	11:06:48
7	Q. Okay. Thank you. Does Synta Canada own	11:06:50
8	shares in any other companies?	11:06:58
9	A. Yes.	11:07:15
10	Q. Which companies?	11:07:16
11	A. Synta Canada owns shares of SW.	11:07:36
12	Q. Does Synta Canada own shares in any other	11:07:40
13	companies besides SW Technology?	11:07:44
14	A. Yes.	11:08:00
15	Q. And what companies are those?	11:08:02
16	A. It has some shares of Suzhou Synta and also	11:08:32
17	Nantong Schmidt.	11:08:37
18	Q. Okay. Thank you. Does Synta Canada own	11:08:40
19	shares in any companies besides SW Technology,	11:08:42
20	Suzhou Synta, and Nantong Schmidt?	11:08:46
21	A. No.	11:09:15
22	Q. What percentage of the shares of SW	11:09:26
23	Technology does Synta Canada own?	11:09:28
24	A. Would you please repeat the question.	11:09:49
25	THE MAIN INTERPRETER: The interpreter will	11:09:51

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1 repeat the question.

11:09:53

2 (Interpretation by interpreter.)

11:10:17

3 THE WITNESS: 24 percent.

11:10:17

4 MR. SCHLABS:

11:10:18

5 Q. What percentage of the shares of Suzhou

11:10:19

6 Synta does Synta Canada own?

11:10:22

7 A. 20 percent.

11:10:47

8 Q. And what percentage of the shares of

11:10:52

9 Nantong Schmidt does Synta Canada own?

11:10:55

10 A. 20 percent.

11:11:22

11 Q. Okay. Thank you. Does Synta Canada have
12 any officers?

11:11:23

11:11:36

13 A. When?

11:11:51

14 Q. Now.

11:11:52

15 THE MAIN INTERPRETER: I'm sorry. The
16 interpreter did not hear you clearly.

11:12:01

11:12:03

17 MR. SCHLABS: Did not hear me?

11:12:05

18 THE MAIN INTERPRETER: Yeah. Did you say
19 "now"? Okay.

11:12:07

11:12:09

20 MR. SCHLABS: Now, yes.

11:12:09

21 THE WITNESS: Well, right now is a
22 so-called officer -- it's called a secretary, right?

11:12:29

11:12:31

23 MR. SCHLABS:

24 Q. Who is Synta Canada's secretary right now,
25 then?

11:12:38

11:12:40

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1 you questions about the same topic, Topic No. 1, 11:26:33
2 except for SW Technology. Do you understand? 11:26:38
3 A. I understand. 11:26:57
4 Q. What year was SW Technology established? 11:26:58
5 A. 2005. 11:27:12
6 Q. Who started SW Technology? 11:27:14
7 A. There were two companies who cofounded the 11:27:37
8 company. 11:27:41
9 Q. And who were the two companies that 11:27:46
10 cofounded SW Technology? 11:27:49
11 A. One was Synta Canada. The other one was 11:28:26
12 Synta Technology. 11:28:29
13 Q. And why did Synta Canada and Synta 11:28:33
14 Technology establish SW Technology? 11:28:40
15 A. The only purpose was the acquisition of 11:29:10
16 Celestron. 11:29:15
17 Q. Is it fair to describe SW Technology as an 11:29:22
18 investment holding company? 11:29:26
19 A. Yes. 11:29:46
20 Q. Which individuals or entities are 11:29:47
21 shareholders in SW Technology? 11:29:53
22 A. I just talked about it. There were two 11:30:19
23 entities, two companies. 11:30:22
24 Q. Fair enough. Other than Synta Canada and 11:30:24
25 Synta Technology, have there ever been any other 11:30:28

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1 STATE OF CALIFORNIA)
)
2 COUNTY OF SACRAMENTO)

3 I, TAMMY MOON, CSR No. 13184, Certified
4 Shorthand Reporter, do hereby certify:

5 That prior to being examined, the witness
6 in the foregoing proceedings was by me duly sworn to
7 testify to the truth, the whole truth, and nothing
8 but the truth;

9 That said proceedings were taken by me in
10 shorthand and thereafter transcribed into
11 typewriting under my direction and supervision;

12 That I am neither counsel for, nor related
13 to, any party to said proceedings, nor in any way
14 interested in the outcome thereof.

15 I further certify that I am not a party to
16 any stipulation, if made, that would waive my duties
17 mandated by the Court Reporters Board of California.

18 In witness whereof, I have hereunto
19 subscribed my name.

20 Dated: 3rd of April, 2024

21
22 *Tammy Moon*
23 -----

24 Tammy Moon, CSR No. 13184, RDR, CRR
25